

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

EAST VALLEY GLENDORA)	
HOSPITAL LLC, D/B/A)	
GLENDORA COMMUNITY)	
HOSPITAL)	Case No. 31-CA-229412
)	
and)	
)	
SEIU LOCAL 121RN)	

JOINDER IN GENERAL COUNSEL'S MOTION FOR SUMMARY JUDGMENT

The Charging Party, SEIU Local 121RN, hereby joins in the General Counsel's Motion for Summary Judgment dated November 20, 2018. The Charging Party also suggests the following additional remedies that are appropriate in this case.

1. The Board's Notice and Decision should be mailed to all employees so that they are aware of its issuance and have some context for what occurred in the case. The Notice suddenly appearing in the workplace does not adequately explain to the employees why the Notice has been posted, and employees are likely to disregard a posted notice without advance warning of its issuance.

2. For the same reasons, the Notice should contain the following statement and admission of the unlawful conduct: "We violated the National Labor Relations Act when we refused to accept that Registered Nurses voted to join the Union, SEIU Local 121RN, in a secret-ballot election. We accept the choice of these employees and recognize the Union as their bargaining representative."

3. Rather than the standard 60 days, the Notice should be posted for the same period of time that the refusal to bargain was ongoing. In a case such as this refusal to

bargain, where an award of interest cannot be applied to remedy the Employer's delay, the Employer is not sufficiently deterred by a posting period which is less than the period of its misconduct.

4. The name of the Employer representative who signs the Notice should be clearly printed on the Notice, either by hand or by the Board, so as to make certain that employees know who the responsible person is even if the signature is illegible.

5. The Notice should be read to employees in the following conditions: (a) a National Labor Relations Board agent should hold paid, work-time meetings of employees in sufficient number and variety to permit all employees across all shifts and schedules to attend; (b) the Board agent should not only read the Notice, but should answer employee questions about the remedies ordered by the Board; and (c) the Employer should not be present at the meeting.

The Charging Party respectfully requests that the Board grant the General Counsel's Motion for Summary Judgment with the additional remedies described above.

Dated: December 5, 2018

Respectfully Submitted,

/s/ Jason Wojciechowski
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CERTIFICATE OF SERVICE

I certify that on December 5, 2018 a true copy of the foregoing **Joinder in General Counsel's Motion for Summary Judgment** was filed via the National Labor Relations Board electronic filing system and sent by electronic mail from the address of WojciechowskiJ@seiu121RN.org to the following parties in this action:

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